

**Before the  
Federal Communications Commission  
Washington, D.C. 20554**

Wireless Telecommunications Bureau	)	CC Docket No. 94-102
Standardizes Carrier Reporting on Wireless	)	
E911 Implementation	)	OMB Control No. 3060-1004

To: Judy Boley Herman  
Room 1-C804

**COMMENTS OF VERIZON WIRELESS**

Verizon Wireless submits brief comments on the *Public Notice* released by the Wireless Telecommunications Bureau (“Bureau”). The Bureau has developed a new Excel spreadsheet designed to standardize the format for reporting wireless Enhanced 911 (“E911”) deployment data. This effort is a modification of an existing reporting obligation for which carriers had styled their own reports to comply with the orders granting them individualized waivers. Although each carrier designed its reports to reflect its unique obligations and methods for documenting deployment status, many of the reports conveyed the same basic information.

Under the Paperwork Reduction Act (“PRA”), the FCC must minimize the paperwork burden resulting from the collection of information by or for the federal government.<sup>1</sup> The Office of Management and Budget’s (“OMB”) implementing regulations require a federal agency to demonstrate that it has “taken every reasonable step to ensure that the proposed collection of information: (i) [i]s the least burdensome necessary for the proper functioning of the agency’s functions to comply with legal

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<sup>1</sup> Paperwork Reduction Act, 44 U.S.C. § 3501 *et seq.*

requirements and achieve program objectives; (ii) [i]s not duplicative of information otherwise accessible to the agency; and (iii) [h]as practical utility.”<sup>2</sup>

Verizon Wireless and other carriers have been filing Quarterly Status reports for more than a year and have substantial experience with collecting and formatting voluminous and detailed information.<sup>3</sup> Verizon Wireless has strived to make its reports thorough yet easily understandable. Given this experience, the Bureau should have consulted reporting carriers before requiring them to reconfigure well-oiled processes and databases previously developed to provide E911 deployment data.<sup>4</sup> Carriers will have ideas and opinions on ways to express the information required in a uniform format, but reduce any undue burden associated with this mid-stream change.

While Verizon Wireless does not oppose the Commission’s stated goal of uniformity for these reports, it has a few concerns that, if addressed, could reduce the burden on carriers associated with retooling their internal databases and reporting procedures. Specifically, Verizon Wireless would like the Bureau to modify certain aspects of the proposed format:

- (1) The PSAP ID numbering scheme is flawed. First, it does not provide for mid-stream changes in PSAP numbers to include additional PSAPs at a later date. The Bureau should seek input from carriers regarding a better numbering scheme or simply adopt the unaltered NENA numbering scheme. Second, PSAP ID numbers have been erroneously assigned to emergency services

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<sup>2</sup> 5 C.F.R. § 1320.5(d)(1).

<sup>3</sup> Verizon Wireless filed its first quarterly report on February 1, 2002.

<sup>4</sup> While Verizon Wireless appreciates this opportunity to comment, on July 22, 2003 the Bureau sought emergency approval from the Office of Management and Budget (which was not noticed in the *Federal Register* until July 28, 2003) to require carriers to follow the new format by August 1, 2003 – well before today’s comments and before comments are due on the *Federal Register* notice. Not only was this unnecessary for an existing collection, but it denied the Bureau the opportunity to receive and fully vet carriers’ suggestions for improvements or necessary modifications to the revised reporting obligation.

entities that are not PSAPs because they do not answer calls and are not upgraded with E911 capability.

- (2) The list of PSAPs is both over-inclusive and under-inclusive and does not match carriers' records (or even the records of state or local PSAP agencies). The list is over-inclusive because it includes as PSAPs, emergency services entities that are dispatched to provide emergency assistance but do not answer calls from the public. For example, one configuration is for a centralized PSAP to have sole call taking responsibility for multiple areas and dispatch the local emergency services personnel to the location. The entities that "hang off" the centralized PSAP are not PSAPs in the technical sense and do not have the E911 capabilities of the centralized PSAPs. The list is under-inclusive in that it sometimes does not list known PSAPs with which carriers have conducted deployments. In some cases, multiple PSAPs associated with a request have been listed in error under one PSAP ID number.<sup>5</sup> Initially the FCC should seek input from carriers regarding its list before requiring carriers

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<sup>5</sup> Specific examples of PSAPs that Verizon Wireless has deployed or is in the process of deploying which do not have IDs are:

NJ	Statewide request	Atlantic Co	Atlantic Co Sheriffs Office
			Mays Landing Police Department
		Bergen County	Inter Borough Radio System
		Mercer County	Pennington Police Department
			Princeton University 911
WV		Middlesex Co	Cranbury Police Department
			Monroe Township Police Department
		Doddridge Co	Central Communications
SC		Albany County	Albany County Sheriffs Office
		Clarendon	Clarendon Emergency Communications
NC		Multiple Co	The Eastern Band of Cherokee Indians
		Hamilton Co	New York State Patrol- Hamilton
		Rensselaer Co	New York State Patrol- Rensselaer
		Schoharie Co	New York State Patrol- Schoharie

to conform to it to ensure uniformity and accuracy. Otherwise, carriers will be required to retool their databases several times while the FCC fixes its list.<sup>6</sup>

- (3) Verizon Wireless developed a milestone chart for its reports that helps explain the progress of its Phase I and II deployments in a standardized manner and reduces the amount of verbiage required for the comments column. Verizon Wireless found that using standard explanations/milestone status made its report clearer when it was describing the same status for many deployments. The current format does not accommodate this practice. Verizon Wireless does not wish to impose its methodology on other carriers, but merely asks to be able to populate either the “reason” or the “comments” column with its milestone status and refer to the milestone explanatory chart in the accompanying narrative that is filed with the report.

These concerns can and should be addressed *before* the Bureau seeks to impose and enforce the new reporting format. In this manner, carriers will not need to retool their databases and processes multiple times and can just do so once when a final and workable format for the reports is established.

The instructions to the proposed format indicate that certain columns are required, while others are not. Verizon Wireless applauds this approach and is pleased that the Bureau has provided carriers some degree of flexibility. Verizon Wireless believes that the required columns captures the essential information necessary to monitor the pace of deployments and to query carriers about any particular deployment – which are the critical points of the reporting obligation.<sup>7</sup>

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<sup>6</sup> The FCC should determine how it intends to communicate future changes to the PSAP list and when such changes would be made. For example, the FCC could choose to make changes as they are notified or at a set time before each quarterly report.

<sup>7</sup> Verizon Wireless’s Waiver Order stated, “To assist in monitoring an enforcing each of the conditions imposed on Verizon, as set forth in summary below, we also require that Verizon

Among the data requested, but not required, one column pertains to whether a request is “invalid.” If left blank, the FCC will assume that the request is valid, which has legal meaning in this context. Verizon Wireless believes that this column is not necessary and should not be used to prejudice the status of any deployment that may later be subject to the certification process or otherwise. In Verizon Wireless’s experience, the labels “valid” or “invalid” are unhelpful. Rarely does a complex deployment situation lend itself to a rigid classification and efforts to label a request as valid or invalid may unnecessarily impede cooperation. Verizon Wireless has long since learned to avoid such classifications and seeks to deploy with the PSAP as far as possible and to negotiate a revised deployment date with the PSAP given the particulars of its circumstance and its challenges. This collaborative approach works well because the parties are not focused on technical legal validity of a request but are focused on completing the remaining tasks in a mutually agreeable timeframe.

However, despite our efforts, if the deployment cannot move forward in a reasonable timeframe and/or no revised date can be agreed upon, the certification process provides a mechanism for explaining the causes of delay beyond a carrier’s control. The nature of the certification process whereby the carrier must explain how, through no fault of its own, the PSAP is not ready to complete deployment will be complicated if there is a determination from these reports that a blank column meant that the carrier deemed the request to be “valid.” For this reason, the “valid/invalid” column will be counterproductive and should be omitted.

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file Quarterly Reports with the Chief of the Enforcement Bureau and the Chief of the Wireless Telecommunications Bureau.” See Revision of the Commission’s Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems, *Order*, CC Docket No. 94-102, FCC 01-299 (rel. October 12, 2001) (“*Waiver Order*”) at ¶30.

## Conclusion

For the foregoing reasons, Verizon Wireless requests that the Bureau modify the proposed E911 report in a manner consistent with these comments.

Respectfully submitted,

VERIZON WIRELESS

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